

REMARKS

The applicants appreciate the Examiner's thorough examination of the application and request reexamination and reconsideration of the application in view of the following remarks.

The Examiner rejects claims 1-11, 13-24, 26 and 27 under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. App. Publ. 2003/0046421 to *Horvitz et al.* The Examiner also rejects claims 12, 25, 28 and 29 under 35 U.S.C. §103(a) as being unpatentable over *Horvitz et al.* in view of U.S. Pat. No. 6,832,245 to *Isaacs et al.* The Examiner further rejects claims 12, 25, 28 and 29 under 35 U.S.C. 103(a) as being unpatentable over *Horvitz et al.* in view of U.S. Pat. No. 6,578,025 to *Pollack et al.*

Each of the Examiner's rejections is based in whole or in part on the primary reference U.S. Pat. App. Publ. No. 2003/0046421 to *Horvitz et al.*, which has a filing date of December 12, 2001 and a publication date of March 6, 2003. Both of these dates are after the priority date of the subject patent application, which is February 22, 2001.

Thus, the applicants respectfully submits that because the effective filing date of the present application precedes the effective filing date of the *Horvitz et al.* reference, that *Horvitz et al.* is not a proper reference.

Accordingly, because *Horvitz et al.* serves as the basis for the rejections of each of the pending claims, either in whole or in part, the applicants request that the Examiner withdraw the rejections for this reason.

Also, in the Response to Arguments section, the Examiner disagrees with the applicants' previous arguments that *Horvitz et al.* does not determine the purpose of the message. The applicants re-iterate their arguments as previously submitted in addition to the new grounds for

withdrawal of the rejections as discussed above.

Additionally, in contrast to the applicants' claimed invention, *Horvitz et al.* does not teach -- among other things -- characterizing the relationships among the members of the social network based on the pattern and purposes of the messages.

Instead of characterization of relationships based on the pattern and purposes of the messages, *Horvitz et al.* teaches a limited number of "relationships" which are pre-determined in order to assign a certain priority to such messages. See e.g. *Horvitz et al.* at [0136], and [0138]-[0141] (which are pointed out by the Examiner in support of this aspect of the rejection):

Names on *pre-determined list* of important people, potentially segmented into a variety of classes of individuals, (e.g. Family members, Friends) ...

Information about the structure of organizational relationships relative to the user *drawn from an online organization chart* such as:
... Managers user reports to, ... Manager of the managers of users,
... People who report to the user ...

Likewise, the "structural relationship" that may be "considered" by *Horvitz et al.*, see e.g. [0015] and [0251] (which are also pointed out by the Examiner in support of this aspect of the rejection) are for consideration "in the classification process" in order to help determine the criticality of the message. There is no characterization of relationships among the members of the social network based on the pattern and purposes of the messages. Instead, the priority of the messages are selected based on the (pre-)established relationships between the members, i.e. whether the sender is internal or external to the organization of which the user is associated. See e.g. [0251] of *Horvitz et al.*

Thus it is clear that *Horvitz et al.* -- which the Examiner cites as disclosing characterizing relationships among members of the social network -- indeed does not include characterizing the

relationships among the members of the social network based on the pattern and purposes of the messages, in contrast to the applicants' claimed invention. Thus, independent claims 1, 15, 28 and 29 are allowable, as are claims 2-14 which depend directly or indirectly from claim 1, and claims 16-27 which depend directly or indirectly from claim 15.

Accordingly, each of the applicants' claims 1-29 are in condition for allowance.

Each of the Examiner's rejections has been addressed or traversed. It is respectfully submitted that the application is in condition for allowance. Early and favorable action is respectfully requested.

If for any reason this Response is found to be incomplete, or if at any time it appears that a telephone conference with counsel would help advance prosecution, please telephone the undersigned or his associates, collect in Waltham, Massachusetts at (781) 890-5678.

Respectfully submitted,



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TET/ok